GOODWIN PROCTER

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September 5, 2013

## **VIA FACSIMILE TO (212) 805-7986**

Honorable Paul G. Gardephe United States District Court for the Southern District of New York United States Courthouse 40 Foley Square Street New York, NY 10007

MEMO ENDORSED

The Application is granted.

SO ORDERED:

Re: United States v. Martoma, No. 12 Cr. 973 (PGG)

Dear Judge Gardephe:

As you know, we represent Mr. Martoma in this matter. Yesterday, we received the four-page letter (with exhibits) submitted by counsel for Dr. Gilman in connection with Mr. Martoma's pending motion to compel (Dkt. No. 35). In light of the Jewish holidays, Mr. Strassberg's limited availability due to the Countrywide action, and the substantive nature and length of Dr. Gilman's submission, we respectfully request one week to respond to Dr. Gilman's letter, which would set Mr. Martoma's response due on Wednesday, September 11, 2013.

Respectfully submitted,

Roberto M. Braceras

cc: Arlo Devlin-Brown (by e-mail) Jonathan Halpern (by e-mail) Marc Mukasey (by e-mail) Richard M. Strassberg (by e-mail)

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